

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Addendum to the July 26, 2004 Statement of Legal and Factual Basis

BWX Technologies, Inc. - Mt Athos Site
Rt. 726 Mt. Athos Road – Campbell County, Virginia
Permit No. SCRO30260

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, BWX Technologies, Inc. has applied for a Title V Operating Permit for its Mt. Athos Site, Campbell County facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____
Keith Sandifer
434-582-5120

Date:

Air Permit Manager: _____
D. J. Brown

Date:

Regional Director: _____
T. L. Henderson

Date:

FACILITY INFORMATION

Permittee

BWX Technologies, Inc. - Mt Athos Site
P. O. Box 785
Lynchburg, VA 24505-0785

Facility

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P. O. Box 785
Lynchburg, VA 24505-0785

AIRS ID No. 51-031-0006

PERMIT AMENDMENT INFORMATION

This amendment is being generated to incorporate control device (PC-14A-2 and PC-14A-3) changes for uranium dissolvers (EU-15A-1) that were installed per an NSR permit that was issued on October 28, 1999, as amended on December 23, 2004.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was conducted on September 30, 2003. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The following emissions units were modified at this facility consist of:

four uranium metal dissolvers (EU-15A-1) rated at 20 kg/batch (each) controlled by a two-stage ejector/scrubber system (PC-14A-2 and PC-14A-3), Stack ID (VS-14A-4).

EMISSION UNIT APPLICABLE REQUIREMENTS - Uranium Metal Dissolvers (EU-15A-1)

Limitations

Conditions V.A.1. - 4. contain the limitations. These were taken from the NSR permit issued 12/23/2004.

Monitoring

Condition V.B.1. requires that the ejector/scrubber system (PC-14A-2 and PC-14A-3) shall be equipped with devices to continuously measure the ejector/scrubber liquid flow rate and the differential pressure drop across the ejector/scrubber and the ejector/scrubber liquid pH. This requirement was taken from the NSR permit issued 12/23/2004.

Condition V.B.2. requires each pressure drop meter used to continuously measure pressure drop, each liquid flow rate meter, and liquid pH meter shall be observed by the permittee with a frequency of not less than once per day to ensure good performance of the ejector/scrubber system.

Condition V.B.3. contains the opacity periodic monitoring. Monitoring of visible emissions will be required of the source to make an observation of the uranium metal dissolvers (EU-15A-1) stack (VS-14A-4) at least one time per week, when the units are operating. They are to observe for the presence of visible emissions from the stack. If visible emissions are observed, the permittee will have to take timely corrective action to resume operations without visible emissions or perform a VEE in accordance with 40 CFR 60, Appendix A, Method 9 to assure visible emissions compliance. The permittee will keep a log of observations, any VEE recordings, and any corrective action. If the unit has not operated during the week, this fact shall be noted in the log, and that the visible emission observation was not required. Also, if visible emissions have been conducted for 12 consecutive weeks and no visible emissions are seen, the permittee may reduce the monitoring frequency to once per month for the stack.

Recordkeeping

Condition V.C. contains the record keeping requirements for the uranium metal dissolvers (EU-15A-1). These are taken from the NSR permit issued 12/23/2004.

Testing

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The only reporting that is required is stated in the General Conditions.

Streamlined Requirements

None

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

INSIGNIFICANT EMISSION UNIT

No additional insignificant units have been added.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

Public participation is required for the proposed significant permit modification, per 9 VAC 5-80-230 D.

The proposed permit will be placed on public notice in The News and Advance from

BWX Technologies, Inc. - Mt Athos Site

SCRO30260

Addendum Statement of Basis for July 26, 2004 Title V Permit

Page 5

[date] to [date] .